

State Law Privacy Addendum for California & Other States.

Last updated: September 15, 2023

Introduction.

Applicable State Law provides residents of California and certain other states with additional privacy rights, and they require that we provide this notice (the "Notice") regarding the collection and use of the personal information of their residents by Wilson Language Training Corporation ("we," "us," or "Wilson"). This Notice applies to those individuals who visit our Sites (as defined in the Corporate Website Privacy Policy). These individuals are hereinafter referred to as "you." This Notice supplements the Corporate Website Privacy Policy.

For a more detailed description of our privacy practices that apply to our collection and use of personally identifiable information through FUN HUB® and our other digital products, please review our Digital Products Privacy Policy, available at <https://www.wilsonlanguage.com/digital-products-privacy-statement/>.

Definitions.

For the purposes of this Notice, "Applicable State Law" refers to such applicable laws and regulations, in each case, as may be amended, superseded, or replaced from time to time, that apply to our collection and use of your personal information through our corporate website, which may include, but is not limited to: the CCPA, Colorado Privacy Act, Connecticut Data Privacy Act, Massachusetts 201 CMR 17.00 *et seq.*, Tennessee Information Privacy Act, Utah Consumer Privacy Act, or the Virginia Consumer Data Protection Act. "CCPA" refers to the California Consumer Privacy Act of 2018, as amended and clarified by the California Privacy Rights Act of 2020, and any binding regulations promulgated thereunder.

As used in this Notice, "personal information" refers to information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual, and which is protected under Applicable State Law. Personal information does not include publicly available information obtainable from government records or from other public sources, including any information published on the internet.

Your Rights and Choices.

Subject to certain limitations, you (as "you" is defined above) have the following rights:

- **Right to Delete.** You have the right to request that we delete the personal information we have collected about you. Please note that we may not be able to delete all or some of your personal information if we require it for permitted business purposes or to comply with certain laws.
- **Right to Correct.** You have the right to request us to correct inaccurate personal information we maintain about you.
- **Right to Know and Access.** You have the right to know, and the right to request access to: the categories of personal information we collect or have collected about you in the past 12 months, the categories of sources for such personal information, the purpose for our collection, the categories of third parties with whom we have shared your personal information, and the specific pieces of personal information we have collected about you.

- **Right to Limit Use and Disclosure.** *We do not sell your personal information.* However, we are required by the CCPA to inform you that: (a) you have the right to opt out of the sale of your personal information if we ever engage in such activity, and; (b) we have not sold your personal information in the prior twelve months. We do not share your Sensitive Personal Information (as defined by the CCPA) for the purpose of inferring characteristics about you.
- **Right to Non-Discriminatory Treatment.** You have the right not to be discriminated against for exercising the rights provided to you.

To exercise any of these rights, please reach out as described in the “Exercising Your Rights” section of this Notice below.

Categories of Personal Information.

We collect, and may have collected in the past twelve (12) months, the following categories of personal information identified in the first column below, which may include Sensitive Personal Information as defined in the CCPA, and for the business purposes stated in adjacent cell under the “Purpose” column (depending on the nature of your interactions with us):

Categories of Personal Information We Collect	Purpose
Identifiers <i>e.g.</i> , full name, Wilson Academy user name, signature, identification details, mailing address, phone number, email, and other contact details.	To provide you with our Services, to respond to inquiries, process your request for information, purchase materials and services, create your account on Wilson Academy.
Commercial information <i>e.g.</i> , products or services purchased, obtained, or considered, feedback regarding professional services attended.	To provide you with our Services, offer customer support, and to comply with our legal obligations.
Internet & other network activity information <i>e.g.</i> , browsing history, search history, and information regarding a consumer’s interaction with an internet website application, interaction with online communication tools (<i>e.g.</i> , chatbot), or advertisement.	To provide you with our Services, to maintain our systems, and to track your use of our Sites to improve user experience.
Professional or employment-related information <i>e.g.</i> , name of your school or school district, WRS certification status	To provide you with our Services, to respond to inquiries, process your request for information, purchase materials and services, create your account on Wilson Academy.

<p>Sensory Data. <i>e.g.</i>, phone calls, video conferences, or in-person conferences.</p>	<p>Recordings of customer service calls may be created for quality control purposes. Recordings of meetings or video conferences, may be collected in support of the conduct of our business if you attend a WLT event or webinar.</p>
<p>Financial Information. <i>e.g.</i>, purchase-order information, payment-card data.</p>	<p>To process transactions, to facilitate your purchase of our products or services, to troubleshoot to detect and prevent fraud.</p>

We may additionally use any or all of your personal information for the following purposes:

- Authentication and support of your access to our products or services;
- To provide you with information regarding our products and services;
- Support of the operation of our website and business, such as for IT and information-security purposes, for de-bugging and repairing errors, to analyze usage of our systems and tools, for audit purposes, or in connection with a Government inquiry;
- Research and development purposes;
- Benchmarking for internal reporting purposes;
- Fulfillment of our compliance or legal obligations or as otherwise permitted by applicable laws, policies, and regulations (collectively “Compliance Purposes”);
- Advancing or defend our legal rights, and;
- for the purpose described to you when collecting your personal information.

Sources of Personal Information.

We collect personal information directly and indirectly from you when you navigate through our Sites, purchase materials and/or services and use our Services.

How we Share Personal Information.

We may disclose your personal information to third parties as follows:

- Service Providers. We have engaged in the prior twelve months, and will continue to engage, certain service providers that we use to perform our business functions. We may share your personal information with these vendors, who are bound by applicable laws and obligations of confidentiality to maintain your personal information in a secure and confidential manner. You may also share this personal information directly with those vendors. These vendors may include: payment processing vendors, software-analytics companies, web-hosting vendors, and other service providers.

- Government Agencies or Regulators. We may be required by applicable laws, policies, or regulations to provide your information to Government authorities or regulators.
- Merger or Sale. We may disclose your personal information to a buyer or successor in the event of a merger, sale, or other transfer of the ownership or control of Wilson.

Retention of Personal Information.

We will retain your personal information only as long as is reasonably necessary for the operation of our business and to fulfill our Compliance Purposes.

Changes.

We review this Notice at least annually, and we reserve the right, at our sole discretion, to modify or replace this Notice at any time. When we make any changes, we will alert you by posting an updated version of this Notice on our website and updating the "Last Updated" date above. Changes will become effective when posted.

Exercising Your Rights.

If you have any questions or wish to exercise any rights under CCPA, you can contact us via email at Legal@wilsonlanguage.com, via phone at 508.368.6678, or by U.S. mail at:

Wilson Language Training Corporation
47 Old Webster Road
Oxford, MA 01540
Attention: Legal

Please note that, once a request has been submitted, we may ask you for additional information to verify your identity or to obtain additional details to help us respond to your request. This supplemental information may include your name, mailing address, email address, or other details related to your interactions with WLT. Where applicable, these requests can be submitted by an authorized agent through the channels described above in accordance with Applicable State Law. In these instances, we will take steps to verify the authorized agent's authority to act on your behalf. Depending on the evidence provided, we may still need to separately reach out to you to confirm the authorized agent has permission to act on your behalf and to verify your identity in connection with the request.

If deletion of your personal information is requested, please note that deletion may affect our ability to provide you with our products and services. For WRS certified individuals, deletion of your record from our certification records will result in information about your certification status to be eliminated, which may require you to become re-certified.

Nevada Residents.

We are required under Nevada law to inform you that we do not sell the personal information of consumers.