

## Privacy Policy

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Certified Licensing Professionals, Inc. ("CLP", "We", "Us", or "Our") is based in Charlotte, North Carolina, USA. CLP administers the Certified Licensing Professional (CLP) exam and program and other credentialing programs to recognize professionals who have demonstrated their experience and proficiency in the licensing and commercialization of intellectual property.

We communicate with candidates for CLP credentials and credential holders in a number of ways, including via the CLP Web Site available at <http://www.licensingcertification.org/> and other websites that link to this Privacy Policy (the "Site"), via email or by phone. Please read this thoroughly in order to ensure that You understand the circumstances under which CLP collects data You may provide to Us, how We use it, how We share it, and Your choices with respect to such information. At the end of this Privacy Policy, We also tell You how You can reach Us if You have any questions, comments or concerns.

CLP has created this Privacy Policy (the "Privacy Policy") in order to inform you ("You", "Your", or "Yourself") as a user of the Site of the circumstances under which We collect information and data from You.

### **1. Types of Information Collected**

We may interact with You in a variety of ways and collection information during those interactions. While some of the information collected by CLP is required (e.g., for purposes of registering You for a certification exam), You may voluntarily provide other information. If you choose to use the Site without providing your information You may still be able to visit some portions of the Site. However, You will not have access to all of the Site.

a. **Traffic Data Collected.** CLP automatically gathers general statistical information about visitors to the Site. Accordingly, CLP may automatically track and collect certain technical information from You when You visit the Site. This may include: (i) Your IP address; (ii) Your domain server; (iii) Your type of computer; (iv) Your type of browser (v) the pages You viewed and (vi) the goods and services You purchased (collectively "Traffic Data"). Traffic Data generally does not identify You, but if it does then We will treat it as "personal information" as described below. We use Traffic Data for improving Your experience on the Site. Traffic Data may be provided to third parties. We use third-party service providers to collect usage analytics and to set and track cookies on our behalf, such as Google Analytics. CLP may also use "cookies" for specific purposes such as customizing content specific to Your interests, or storing Your password so that You do not have to re-enter it each time You visit the Site. A cookie is a small amount of data that is sent to Your browser from a web server and stored on Your computer's hard drive. Cookies allow us to recognize your device and to collect information such as internet browser type, time spent using the Site, and pages visited. This helps us to provide you with a good experience when you browse the Website and also allows us to improve the Site. Cookies further allow us to present to you the information that will most likely to appeal to You based on your activity and preferences. We may also use cookies to track your responses to Our advertisements and we may use cookies or other files to track Your use of other websites. Preference and options configurations in Your browser determine if, and how, a cookie will be accepted. You can refuse to accept the cookies we use by adjusting your browser settings. However, if you do not accept these cookies, You may affect Your use of the Site and ability to access certain features of the Site. You can find out more about how to

manage cookies here: [www.allaboutcookies.org/manage-cookies](http://www.allaboutcookies.org/manage-cookies). If You do so and cookies are disabled, You may be required to re-enter Your information more often and certain features of the Site may be unavailable.

b. Personal Information Collected. In order for You to access certain areas of the Site, to receive certain services or to register to attend meetings, or to purchase products that CLP offers via the Site, CLP may require You to provide Us or Our service providers with information that personally identifies You ("Personal Information"). Personal Information may include: (i) contact data such as Your name, mailing address, e-mail address and telephone number ("Contact Data"); (ii) financial data such as Your account or credit card number ("Financial Data"); (iii) employment and education information and other career related data such as your current employer, job title, information contained in Your Curriculum Vitae and your education history, ("Career Data"); (iv) demographic data such as Your zip code ("Demographic Data"). If You communicate with Us by e-mail, post messages to any chat groups, bulletin boards or forums offered by Us via the Site, or otherwise complete online forms, or surveys, any information provided in such communication may be collected as Personal Information.

If You provide Contact Data for a professional reference, then you understand, acknowledge and agree that You, and not CLP, are responsible for obtaining all necessary permissions and consents to share such Contact Data with Us.

## 2. Use of Information Collected

CLP uses Traffic Data to improve Our marketing and promotional efforts, to analyze Site usage, to improve Our content and product and service offerings and to customize the Site's content, layout, and services. We may also use Traffic Data to help diagnose problems with Our server, to manage the Site and to enhance the Site based on the usage pattern data We receive. CLP uses Traffic Data, Contact Data, Financial Data, Career Data, and Demographic Data for the purposes identified in the table below.

Purpose	Legal Basis
To provide the Site and Our services to you;	For our legitimate business interests (i.e., the provision of the Site and the services) and, depending on the circumstances, to perform a contract between You and Us
To communicate with you and to respond to questions that you have raised with us;	For our legitimate business interests (i.e., the provision of the Site and the services)
To register individuals for CLP events (i.e. annual meeting, conferences, etc.);	For our legitimate business interests (i.e., the provision of the Site and the services)
To forward information concerning upcoming CLP events or test information (including details of any events which we believe may be of	For our legitimate business interests (i.e., the provision of the Services)  We may request your consent in circumstances

interest to you) or about products or services in accordance with your preferences as indicated when you entered into any agreement with us, including marketing consent preferences;	
To arrange for speakers at CLP events and authors for CLP publications;	For our legitimate business interests (i.e., the provision of the services)
To provide you with products or services that you have requested or purchased;	For our legitimate business interests (i.e., the provision of the services)
To process your payment for CLP products and events;	For our legitimate business interests (i.e., the provision of the Site and the services)
To determine eligibility;	For our legitimate business interests (i.e., the provision of the services)
To develop a registry for CLP;	With Your Consent
To administer the Site;	For our legitimate business interests (i.e., the provision of the Site)
To prevent and detect fraud; and	For our legitimate business interests and for compliance with legal obligations to which we are subject
To protect and enforce our legal rights.	For our legitimate business interests and for compliance with legal obligations to which we are subject

Where CLP relies on the legitimate interests of CLP or those legitimate interests of a third party to justify the purposes for using your personal information, this will include the commercial interests of CLP relating to planning educational seminars and meetings, and serving CLP candidates and credential holders; compliance with applicable legal and regulatory obligations and any codes of conduct; improvement and development of our business operations and service offerings, or those of a third party; or protection of our business, employees, candidates, credential holders, or those of a third party.

### 3. Disclosure of Information to Third Parties

We may share your Personal Information with third parties who provide services to CLP, including our service providers, contractors and consultants. For example, we use third parties to help manage registration for CLP programs, to provide courses and training, to process your continuing professional

development credits, to print and mail or email our daily or monthly mailings and other publications, to process payments on our behalf, and to increase engagement with our credential holders and customers.

If you opt-in, we may list your name and limited contact information as part of the CLP Registry. We will only list your name, credential held, expiration date, city/state (province)/country of residence as they appear on your credential application, and additional information if you select to share any of the following: phone number, email address, and employer, each as you provide in your database profile.

CLP reserves the right to disclose and/or transfer personal information to a third party, if CLP has reason to believe that disclosing personal information is necessary to identify, contact, or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other website users, or anyone else who could be harmed by such activities. Additionally, CLP may disclose personal information in response to a subpoena, warrant or other court order, or when we believe in good faith that a law, regulation, subpoena, warrant or other court order requires it – or authorizes us to do so – or to respond to an emergency situation.

CLP reserves the right to disclose and/or transfer personal information to a third party in the event of a proposed or actual purchase, sale (including a liquidation, realization, foreclosure or repossession), lease, merger, amalgamation or any other type of acquisition, disposal, transfer, conveyance or financing of all or any portion of CLP, or of any of the business of CLP, in order for you to continue to receive the same products and services from the third party.

We may also share your Personal Information with our professional advisors, such as including accountants, lawyers and other professional advisers that assist us in carrying out our business activities.

We may share your Personal Information for other purposes with your permission or otherwise in accordance with applicable law.

#### **4. User Choice Regarding Collection, Use and Distribution of Personal Information**

You may choose not to provide Us with any Personal Information. In such an event, You can still access and use much of the Site; however, You will not be able to access and use those portions of the Site that require Your Personal Information.

#### **5. Confidentiality and Security of Personal Information; Retention of Information**

Except as otherwise provided in this Privacy Policy, CLP will keep Your Personal Information private and will not share it with third parties, unless such disclosure is necessary to: (a) comply with a court order or other legal process; (b) protect Our rights or property; or (c) enforce Our Terms of Service.

We implement a variety of technical and organizational measures to help protect your personal information from unauthorized access, use, disclosure and transfer. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to the Website and any transmission is at your own risk. Once we have received your personal information, we will use procedures and security features to try to prevent unauthorized access. You must not divulge

Your password to anyone. Our personnel will never ask You for Your password in an unsolicited phone call or in an unsolicited e-mail. Remember to sign out of Your account and to close Your browser window when You have finished Your session.

Whenever You voluntarily disclose personal information online, for example on message boards, through e-mail or in chat areas, that information can be collected and used by others. No data transmission over the Internet or any wireless network can be guaranteed to be perfectly secure. As a result, while We try to protect Your personal information, We cannot ensure or guarantee the security of any information You transmit to Us, and You do so at Your own risk.

We will retain Your personal information for as long as is necessary for purposes for which it was collected. The precise period will depend on the reason why it was collected. Those periods are also based on the requirements of applicable data protection laws, applicable legal and regulatory requirements, and periods relating to the commencement of legal actions.

## **6. User Ability to Access, Update and Correct Personal Information**

You may contact us using the contact information provided at the end of this Privacy Policy if you have any questions, or if you wish to update, correct or amend your personal information. (For individuals located in the EU or the EEA, please also “Your Rights Under the General Data Protection Regulation (GDPR)” below). Please note that we may not be able to correct or update your personal information previously provided to us by third parties. In order to ensure that all of Your Personal Information is correct and up-to-date, if you are a registered user of the Site, then at any time You may visit Your personal profile at <https://clp.certemy.com/entry/login>. Through Your personal profile You may: review and update Your Personal Information that We have already collected. Should You elect any opt-out feature, You may access Your registration/preferences file at <https://clp.certemy.com/entry/login> or by contacting [clpinfo@licensingcertification.org](mailto:clpinfo@licensingcertification.org).

## **7. Do-Not-Track Disclosure; Third-Party Tracking**

Certain mechanisms may allow you to send web browser signals, known as “Do Not Track” (“DNT”) signals, indicating your choice to disable tracking on the Site. We do not respond to browser do not track signals at this time. We may not be aware of or able to honor and respond to every such mechanism. More information about “do not track” is available at [www.allaboutdnt.org](http://www.allaboutdnt.org) concerning such information. Third parties, other than our vendors (such as our website analytics provider), do not have authorization from Us to track which websites You visited prior to and after visiting the Site. That said, We cannot control third party tracking and there may be some third party tracking that occurs without Our knowledge or consent.

## **8. Children**

CLP does not knowingly collect any information from children. To use the Site, You must be the age of legal majority in your place of residence. We will use commercially reasonable efforts to delete information associated with a minor as soon as practicable if We learn that a minor has submitted information to Us.

## 9. Link to Third-Party Websites

The Site contains links to other web sites. We have no control over the content or operation of these websites, nor do we control the confidentiality or privacy practices of the website operators. Consequently, any personal information You submit through such websites is governed by the privacy policies of the websites in question. It is therefore Your responsibility to find out about the third party policies in order to protect information that concerns You. CLP is not responsible for the privacy practices or the content of such web sites.

## 10. Transfer of Information

CLP is headquartered in the United States. If You are located outside of the United States, Your personal information will be transferred and stored in the United States. The United States has not received an “adequacy decision” from the European Commission, which means that the data protection laws of the United States may not offer the same protections as the country in which you reside when You provide information to us. If We transfer personal information outside the European Union (EU) or European Economic Area (EEA), We will implement appropriate and suitable safeguards to ensure that such data will be protected as required by applicable data protection law.

## 11. Your Rights Under the General Data Protection Regulation (GDPR)

If your personal information is protected by the GDPR (i.e., you are located in the European Union or the European Economic Area), then you have certain data protection rights described below with respect to the personal information collected and used by Us. These rights may only apply in certain circumstances and are subject to certain exemptions. You can exercise these rights using the contact details at the end of this Privacy Policy. The rights are as follows:

	Summary of your rights
<b>Right of access to your personal information</b>	You have the right to receive a copy of your personal information that we hold about you, subject to certain exemptions.
<b>Right to rectify your personal information</b>	You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.
<b>Right to erasure of your personal information:</b>	You have the right to ask that your personal information be deleted in certain circumstances. For example (i) where your personal information is no longer necessary in relation to the purposes for which they were collected or otherwise used; (ii) if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal information; (iii) if you object to the use of your personal information (as set out below); (iv) if we have used your personal

	information unlawfully; or (v) if your personal information needs to be erased to comply with a legal obligation.
<b>Right to restrict the use of your personal information</b>	You have the right to suspend our use of your personal information in certain circumstances. For example (i) where you think your personal information is inaccurate and only for such period to enable us to verify the accuracy of your personal information; (ii) the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; (iii) we no longer need your personal information, but your personal information is required by you for the establishment, exercise or defense of legal claims; or (iv) you have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection.
<b>Right to data portability</b>	You have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organization, where it is technically feasible. The right only applies where the use of your personal information is based on your consent or for the performance of a contract, and when the use of your personal information is carried out by automated (i.e. electronic) means.
<b>Right to object to the use of your personal information</b>	You have the right to object to the use of your personal information in certain circumstances. For example (i) where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party); and (ii) if you object to the use of your personal information for direct marketing purposes.
<b>Right to withdraw consent</b>	You have the right to withdraw your consent at any time where we rely on consent to use your personal information.
<b>Right to complain to the relevant data protection authority</b>	You have the right to complain to the relevant data protection authority where you think we have not used your personal information in accordance with data protection law.

## 12. Who is Responsible for Personal Information We Collect; Contact Us

CLP is the data controller for the purpose of data protection law, in respect of your personal information collected and used through your use of the Site. This is because we dictate the purpose for which your personal information is used and how we use your personal information.

If you have any questions regarding this Privacy Policy or the way We use personal information, you can contact us by:

Email: [clpinfo@licensingcertification.org](mailto:clpinfo@licensingcertification.org)

Phone: 888.391.7719

### **13. Updates and Changes to Privacy Policy**

CLP reserves the right, at any time and without notice, to add to, change, update or modify this Privacy Policy, simply by posting such change, update or modification on the Site. Any such change, update or modification will be effective immediately upon posting on the Site.

Last Updated: September 2024