

Alchemy Privacy Notice

Last Updated: April 16, 2021

To download and/or print this Privacy Notice, [click here](#).

Your privacy is important to us. This Privacy Notice describes the types of information Alchemy Systems (“Alchemy”) collects from and about you when you visit <https://www.alchemysystems.com> or any other of our websites where this Privacy Notice is posted (each a “site”), or otherwise interact with us or request services from us as described further in the Privacy Notice. The sites, applications, and other interactions with us are collectively the “Services.” References in this Privacy Notice to “we,” “us,” or “our,” are references to Alchemy. This Privacy Notice also describes how Alchemy uses and discloses personal data, as well as the choices available to you regarding our use of your personal data and how you can access and update this information.

Residents of California have additional rights. California residents should [click here to learn more](#). Alchemy is the data controller of personal data collected through the Services. Alchemy is a U.S.-based company in Austin, Texas at 5301 Riata Park Ct F, Austin, TX 78727. You may contact Alchemy according to the contact information provided in Section 10 below.

When you use the Services, you consent to the use of your personal data by Alchemy as outlined in this Privacy Notice. We recommend you read this Privacy Notice, our Cookie Notice and Terms and Conditions carefully. This Privacy Notice is subject to change. Use of the Services after the Privacy Notice is updated indicates your consent to any changed terms.

This Privacy Notice will explain:

1. What personal data we collect
2. Why we collect your personal data and the legal basis for processing
3. How we disclose your personal data
4. How we protect your personal data
5. How long we keep your personal data
6. Your rights with regard to your personal data
7. Additional information for California residents
8. Additional information for Nevada residents
9. Third-party platforms
10. Questions or complaints about the Privacy Notice

1. What personal data we collect

Categories of personal data collected: Alchemy collects the following categories of personal data:

- Identifiers: Name, email address, telephone number, and unique user ID number assigned by Alchemy for use on the Services. Alchemy also collects system identifiers, such as IP address and unique device identifiers.
- Profile information: Photo, personal headline and/or biography, country, language, your personal website link (if any), social media profiles, and any other information you provide in your profile. This information is publicly viewable by other users of the Services.
- User account information: Username, email address, occupation, title, skill interests, and account settings. User account information also includes student information, such as the professional courses you have viewed, professional course credits, assignments, and professional course certificates.
- Commercial information: Course purchases, subscriptions, examination purchases.
- Financial information: Payment card data, such as your name, credit card information, billing address This data is collected directly by our payment processing partners. Alchemy itself does not store full or partial credit card numbers or card authentication data.
- Shared content: Messages with instructors, teaching assistants, or other students, reviews you post on a course page, essays, answers to questions during courses or examinations, items submitted to satisfy course requirements, and any other content you may post or share. Shared content may be viewable by other users depending on where it is posted.
- Device type information: We also automatically collect system information when you access or use the Service such as device type, operating system type and version, browser, browser language, domain and other systems data, and platform types, and information provided when you contact us.
- Internet or other electronic network activity: Usage statistics about your interactions with Alchemy's Services, including browsing history, search history, courses accessed, time spent on pages or the Service, pages visited, features used, your search queries, click data, date and time, referrals to sites, your interactions with advertisements, and other data regarding your use of the Services.
- Geolocation information: Country, city, and zip or postal code.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes.

Sources of personal data: Alchemy collects these categories of personal data about you from the following sources using the following modes of collection:

- Information that you or your authorized representative provide: When you sign up for and/or use our Services or otherwise engage with us. For example, you provide personal data to us when you create an account, fill out your profile, search for and take courses and examinations, upload coursework or other content, contact us for support or to report a problem or concern, or otherwise engage with our Services. This information may be provided digitally or in hard copy form directly by you or indirectly through your authorized representative.
- Information from other sources: We collect the categories of personal data, described above, about you from another source, for example your representative, your employer, or a publicly available source. If you provide personal data to us about someone else (such as one of your employees or business associates), you acknowledge that you are authorized to disclose that information to us as if it were disclosed to us directly by such other person.
- Information collected through social media: We place advertisements on third party social media platforms or services, such as Facebook and LinkedIn, and collect personal data about you when you click on those advertisements, such as your social media page, .
- Information collected through tracking and automated means: In operating the Services, we use cookies, web beacons, and other technologies to track or automatically collect certain information about internet and electronic network activity, as described above. A cookie is a small text file that is stored by your web browser when you access our website. Cookies help provide additional functionality to the website and help us analyze website usage more accurately. Most browsers accept cookies automatically, but can be configured not to accept them or to indicate when a cookie is being sent. You can manage or disable cookies at any time by adjusting your browser settings, though we recommend that you leave cookies turned on because they allow you to take advantage of some of the website's features. Please view our Cookie Notice for more information on the types of cookies or other automated technologies we use on this website and how you may manage or disable them.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time

Information about children: We do not direct our services or our website to children or individuals under eighteen (18) years of age, and, therefore, we do not knowingly collect or sell personal information of children. Individuals under the age of eighteen (18) should consult with their parent or guardian about the use of this website for their benefit.

2. Why we collect your personal data and legal bases for processing

We collect your personal data for the following purposes:

Where the processing is necessary for entering into or the performance of a contract with you.

This includes:

- Providing you with information about our Services;
- Communicating with you about those Services;
- Performing a contract with you or taking steps are your request prior to entering into such a contract;
- Enhancing the Services we offer;
- Processing your job application.

Based on your consent. For example, consent for marketing purposes, consent to cookies, or where you agree to participate in customer surveys. You can withdraw your consent at any time.

We also process information collected through cookies, such as your location data, IP address, and content viewed on our website, for marketing, site personalization and targeted advertising purposes. We use targeting cookies to market only Alchemy products or services to you on our sites. You can manage or disable cookies at any time by adjusting your browser settings.

Where the processing is necessary for the purposes of the legitimate interests pursued by a third party or us (to the extent it does not infringe on any data subject's fundamental rights and freedoms). This includes:

- Analyzing the use of our website or Services, on the basis of our legitimate interest to understand how our services are perceived and used;
- Improving our website and its content, on the basis of our legitimate interest to enhance our offering;
- Performing administrative functions related to the Services, or other activities related to the provision of Services;
- Assessing and managing our vendor relationships;
- Enhancing the Services we offer
- Disclosing information to Successors as set out below; and
- For data analytics including research on usage patterns, product development, online site customization, customer habits, or other analyses, on the basis of our legitimate interest to understand the usage of our services;
- Defending claims against us; and
- Using IP addresses to identify a user when we feel it is necessary to protect our service, website, visitors, or others. We also reserve the right to protect the security or integrity of the Sites and our business, such as by protecting against and preventing fraud, unauthorized transactions, claims and other liabilities, and managing risk exposure, including by identifying potential hackers and other unauthorized users.

As is necessary for compliance with legal obligations to which we are subject. This includes:

- Satisfying any government reporting obligations and requests.
- Monitoring, reviewing, retaining, and/or disclosing any information as we deem necessary to satisfy or respond to any applicable law, regulation, legal process, or governmental request.
- Cooperating with law enforcement and other authorities in investigating a claim of illegal activity.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

3. How we share, disclose, and use your personal data

We do not sell, trade, or rent your personal data to third parties. We disclose personal data that we collect about you to the following categories of third parties:

- Service providers: We share your personal data with third party service providers whom we engage to perform services for us. These companies are generally bound by contractual obligations to keep personal data confidential and use the data only for the purposes for which it has been disclosed to them. These service providers include:
 - Information technology service providers: We engage information technology service providers to help service our platform, facilitate the functioning of the platform and our services, troubleshoot and resolve issues, secure the platform, and prevent fraud and abuse. The categories of personal data we share with our information technology service providers are identifiers, profile information, user account information, commercial information, shared content, social media information, device type information, and internet activity.
 - Analytics or marketing service providers: We engage analytics or marketing service providers to help us analyze traffic, purchases, and usage patterns for the purpose of helping us understand our users so that we develop products, customize our online platform, engage in targeted marketing of Alchemy products or services on our sites, and market and administer surveys and promotions. The categories of personal data we share with our analytics or marketing service providers are identifiers, device type information, internet or other electronic network activity, and social media information.
 - Payment processors: We engage payment card service providers to collect and process payment card data for purchases made on our sites. This data is collected

directly by our payment processing partners through Alchemy sites, but Alchemy itself does not store full credit card numbers or card authentication data. The categories of personal data our payment card service providers collect are identifiers and payment card information.

- **Social media channels:** We disclose your personal data to third party social media platforms or services, such as Facebook and LinkedIn, when we place advertisements on these social media platforms. The categories of personal data received by social media channels are identifiers, device type information, and internet or other electronic network activity.
- **Government and law enforcement:** We and our U.S. and other foreign service providers may disclose any and all categories of personal data as required by a court order or any other legal or regulatory requirement, including in response to a search warrant or other legally valid inquiry or order, or requests from public and government authorities, or to protect our rights, privacy, safety, or property as we deem necessary if we believe that there has been a violation of our terms of use or of our rights or the rights of any third party, or as otherwise may be required or permitted by applicable U.S., Canadian or other law or legal process, which may include lawful access by U.S. or foreign courts, law enforcement or other government authorities.
- **Successors:** In the event of a sale, merger, consolidation, change in control, transfer of substantial assets, reorganization, or liquidation, we may transfer, sell, or assign to third parties information concerning your relationship with us, including, without limitation, any and all categories of personal data that we have collected about you in accordance with applicable law. We also may disclose this information in connection with the due diligence for any such transaction. Any acquirer or successor may continue to use your data as set forth in this Privacy Notice.

Alchemy is a U.S.-based company. By using Alchemy's Services, you are transmitting information to the United States. If you are a resident of another country, note that the United States may not afford the same privacy protections as your country of residence. If you reside outside of the United States and provide your personal data to Alchemy, you understand that it will be transferred from your current location to the offices and servers of Alchemy and its authorized third parties located in the United States.

To the extent applicable with our business customers, we rely on the Standard Contractual Clauses approved by the European Commission, as amended from time to time, to transfer personal data of EU residents to third party recipients outside the European Economic Area.

4. How we protect your personal data

We will put in place appropriate technical, physical, and organizational or administrative measures to protect personal data from accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, or misuse taking into account the state of the art, costs of implementation and risk. Unfortunately, no method of transmission over the Internet or method of electronic storage is 100% secure. As a result, while we will strive to protect your personal data, we cannot and do not guarantee or warrant the absolute security of any of your personal data. We will not be and are not liable for disclosures of your personal data due to errors in transmission, networks that we do not control, nor unauthorized acts of third parties.

In the event that we are required by law to inform you of any unauthorized access to your personal data, we may notify you electronically or in writing in accordance with applicable law.

5. How long we keep your personal data

We will keep your personal data in accordance with all applicable laws and until such time as we no longer reasonably expect to need to use it for any legal and legitimate purpose after you close your account with us. At the appropriate time, we will take reasonable steps to destroy your personal data in a safe manner.

6. Your rights with regard to your personal data

Depending on your local law, you may have certain rights regarding personal data we have collected about you. Depending on your local laws, these rights may include the right to:

- **Access:** The right to know what personal data we have collected about you and what personal data about you was disclosed to third parties.
- **Correction/Rectification:** The right to update or correct personal data if you believe there is an inaccuracy. For information displayed in your profile, you may also update or correct this information at any time.
- **Restriction:** The right to restrict the processing of your personal data under certain circumstances (such as where you contest the accuracy of your personal data, processing is unlawful, your personal data is no longer needed for the purposes of processing, or you have otherwise objected to processing related to automated individual decision-making).
- **Deletion/Cancellation:** The right to request deletion of your personal data. Please note that the deletion of your personal data may prevent us from providing you content or other benefits that depend on the processing of your personal data.
- **Objection/Opposition: The right to object to our use of your personal data.**
- **Data Portability:** The right to request transmission of your personal data to another data controller.
- **Withdraw consent:** The right to withdraw consent you previously provided to us regarding the processing of your personal data at any time. We will apply your

preferences going forward and this will not affect the lawfulness of the processing before your withdrawal of consent.

Certain of these rights may be subject to limitations or conditions. You may also be able to limit the use and disclosure of your personal data in order for them not to be processed by following the procedure mentioned below.

If you would like to exercise any of these rights provided under local law, you may contact the data privacy office at: security.office@alchemysystems.com. We will not discriminate against you for exercising any of these privacy rights.

To unsubscribe from receiving our marketing email communications, you may contact us or follow the unsubscribe instructions in each email. Please note that you will continue to receive transactional or account-related communications from us.

If you would like to make a complaint about how we handled your personal data, or make a complaint about a breach of data protection laws, please contact us using the information provided below in Section 10. Complaints will be investigated and the outcome of the investigation will be communicated to you after the complaint is made in accordance with applicable law. You may have a right in some locations to file a complaint with your local data protection authority.

7. Additional information for Residents of Other Regions

A. Additional Information for Australian residents

If you are a resident of Australia, this section provides you with additional information about the collection, storage, disclosure and use of your personal information under the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (“APPs”). If you are resident in Australia, and we collect personal data from you to provide Services, the following additional requirements will apply to you:

- **Anonymity and Pseudonymity:** Wherever practicable, we will allow you to deal with us anonymously or pseudonymously, however, in many cases it is not practicable for us to interact in this way.
- **Secondary Purposes:** In addition to the purposes of collection in Section 2 of this Privacy Notice, we may sometimes use the personal information we collect for one or more secondary purposes. We will only do this where: you have consented; the secondary purpose is directly related to the primary purpose set out in Section 2 of this Privacy Notice, and you would reasonably expect us to use or disclose the information in such a way; we are permitted or required by law; or it is in the interests of public safety to do so.

- **Cross-Border Transfers:** We will transfer and store your personal information in the United States, and may transfer your personal information to third parties in the United States, as discussed in Section 3 of this Privacy Notice. If we collect your personal information for the Services, you consent to the disclosure, transfer, storage, use and processing of your personal information outside of Australia. You acknowledge and agree that by providing your consent:
 - we will not be required to take steps as are reasonable in the circumstances to ensure that such third parties located overseas comply with the *Privacy Act 1988* (Cth) and the APPs;
 - if the overseas recipient handles your personal data in breach of the *Privacy Act 1988* (Cth) and the APPs, we will not be liable under them and you will not be able to seek redress against us under them;
 - the overseas recipient may not be subject to any privacy law or principles similar to the *Privacy Act 1988* (Cth) and the APPs;
 - you may be unable to seek redress in the overseas jurisdiction; and
 - the overseas recipient is subject to a foreign law that could compel the disclosure of personal information to a third party, such as an overseas authority.
- **Complaints to the OAIC:** If you are in Australia, and you are not satisfied with the way in which we handle your query, concern or complaint, you can contact the Office of the Australian Information Commissioner by any of the following methods: Phone: 1300 363 922 (calling from inside Australia); Phone: +61 2 9284 9749 (calling from outside Australia); Fax: 02 9284 9666; Mail: GPO Box 5218, Sydney NSW 2001; Email: enquiries@oaic.gov.au; or Web: <https://www.oaic.gov.au/about-us/contact-us>.

B. Additional Information for Brazil residents

If you are a resident of Brazil, in addition to the rights mentioned above in Section 6, you are entitled to enforce the following rights:

- Request confirmation of the existence of the processing.
- Request anonymization, blocking or deletion of unnecessary or excessive data or data processed in noncompliance with the provision of the LGPD.
- Request Information about public and private entities with which we have shared data.
- In the event of processing originated from consent or from a contract, you may request a complete electronic copy of personal data, subject to commercial and industrial secrecy, in accordance with regulations of the national authority, in a format that allows subsequent use, including for other processing operations.
- Request review, by a natural person, of decisions taken solely based on automated processing of personal data that affect data subject interests, including decisions intended to define personal, professional, consumer or credit profile or aspects personality.

If you have any questions or comments regarding your rights under Brazil’s Lei Geral de Proteção de Dados (LGPD), please contact our data protection officer at security.office@alchemysystems.com.

8. Additional information for California residents

If you are a California resident, the California Consumer Privacy Act (“CCPA”) requires us to make certain disclosures about our personal information practices and provides you additional rights related to our collection, use, and sale of your personal information.

A. Notice of Collection

We collect the following categories of personal information about you and use the personal data for the following business or commercial purposes. We do not sell, trade, or rent the personal data of California residents.

Category of personal data collected	Categories of sources of collection	Business or commercial purpose for use	Categories of third parties with whom personal data is shared
<p>Identifiers</p> <p>Name, email address, phone number, telephone number, IP address, and unique device identifiers</p>	<p>Directly from you when filling out your profile or otherwise engaging with our Services</p>	<ul style="list-style-type: none"> • Services registration • Provide our Services • Product purchases • Customer service • Improve our Services • Develop products • Information security • Marketing and analytics • Track site referrals • Site personalization 	<ul style="list-style-type: none"> • IT service providers • Payment card vendors • Business affiliates • Marketing or analytics service providers • Social media partners • Government or law enforcement
<p>Categories of Personal Information in Cal. Civ. Code Section 1798.80(e)</p> <p>Name, phone number, employment, and credit card number (but it is collected and stored by third party payment processors, not Alchemy).</p>	<p>Directly from you when filling out your profile or otherwise engaging with our Services</p>	<ul style="list-style-type: none"> • Services registration • Provide our Services • Product purchases • Customer service 	<ul style="list-style-type: none"> • IT service providers • Payment card vendors

Category of personal data collected	Categories of sources of collection	Business or commercial purpose for use	Categories of third parties with whom personal data is shared
<p>Commercial Information</p> <p>Course purchases, subscriptions, examination purchases</p>	<p>Directly from you when you choose to make a purchase through our Services</p>	<ul style="list-style-type: none"> • Services registration • Provide our Services • Product purchases • Customer service 	<ul style="list-style-type: none"> • IT service providers • Payment card vendors • Business affiliates • Marketing or analytics service providers
<p>Internet or Other Electronic Network Activity Information</p> <p>Browsing history, search history, courses accessed, time spent on pages or the Services, pages visited, features used, your search queries, click data, date and time, referrals to sites, interactions with advertisements</p>	<p>Indirectly from you by observing your interactions with our Services</p>	<ul style="list-style-type: none"> • Improve our Services • Develop products • Information security • Marketing and analytics • Targeted advertising of Alchemy products or services on our sites • Track site referrals • Site personalization 	<ul style="list-style-type: none"> • IT service providers • Business affiliates • Marketing or analytics service providers • Social media partners
<p>Geolocation Data</p> <p>Country, city, and zip code</p>	<p>Directly from you if you choose to provide this information when filling out your profile</p> <p>Indirectly from you based on IP address</p>		<ul style="list-style-type: none"> • IT service providers • Marketing or analytics service providers
<p>Audio or visual information</p> <p>Photographs, course recordings of presenters</p>	<p>Directly from you if you choose to provide this information when filling out your profile</p>	<ul style="list-style-type: none"> • Provide our Services 	<ul style="list-style-type: none"> • IT service providers
<p>Professional or employment-related information</p> <p>Professional courses viewed, professional course credits, assignments, and professional course certificates</p>	<p>Directly from you if you choose to provide this information when filling out your profile or if you apply for a job</p> <p>Indirectly from you by observing your interactions with our Services</p>	<ul style="list-style-type: none"> • Services registration • Provide our Services • Recruitment 	<ul style="list-style-type: none"> • IT service providers • Marketing or analytics service providers

Category of personal data collected	Categories of sources of collection	Business or commercial purpose for use	Categories of third parties with whom personal data is shared
<p>Inferences Drawn from Personal Data</p> <p>Preferences, characteristics, behavior</p>	<p>Directly from you if you choose to provide this information when filling out your profile</p> <p>Indirectly from you by observing your interactions with our Services</p>	<ul style="list-style-type: none"> • Improve our Services • Develop products • Information security • Marketing and analytics • Targeted advertising of Alchemy products or services on our sites • Site personalization 	<ul style="list-style-type: none"> • IT service providers • Marketing or analytics service providers • Social media partners

Alchemy does not sell your personal data. Like many organizations, we engage third parties to help us deliver marketing messages to you about Alchemy products or services on our website. In doing so, we may make available or transfer your personal information (e.g., identifiers such as your IP address, geolocation data, and Internet or other similar network activity) to third parties, such as marketing or analytics service providers and social media partners. We do not believe this is a “sale” of personal data as defined under the CCPA. Nevertheless, we provide you with the ability to opt-out of the disclosure of your personal data in connection with targeting cookies by following the link available in the Cookie Policy.

In the event of a sale, merger, consolidation, change in control, transfer of substantial assets, reorganization, or liquidation, we may transfer, sell, or assign to third parties information concerning your relationship with us, including, without limitation, any and all categories of personal data that we have collected about you in accordance with applicable law. We also may disclose this information in connection with the due diligence for any such transaction. Any acquirer or successor may continue to use your data as set forth in this Notice.

B. California Privacy Rights

If you are a resident of California, the California Consumer Privacy Act (“CCPA”) provides you with the following rights regarding your personal data:

- **Right to Know:** You have the right to request information about our collection, use, and disclosure of your personal data over the past twelve (12) months concerning (i) the categories of personal data we collected about you, (ii) the categories of sources from which your personal data is collected, and (iii) categories of third parties with whom we share your personal data.
- **Right to Deletion:** You have the right to request that we delete certain personal information that we have about you. We may not be able to fulfill your request if we (or our service providers) need to retain your personal information for certain authorized

purposes, such as to provide a good or service you requested, to secure our Services, to protect against fraud, to improve our Services, or to comply with or exercise rights under applicable law.

- **Right to Non-Discrimination:** You have the right not to receive discriminatory treatment against you for exercising any of your privacy rights under the CCPA.

If you would like to exercise any of these rights provided under local law, you can contact us at: (866) 435-5117 or security.office@alchemysystems.com.

Only you or an authorized agent acting on your behalf may make a request related to your personal data. We may need to verify your identity (and if applicable, your agent's authority to make the request on your behalf) before we are able to process your request. We will ask you to provide certain information to verify your identity: name, e-mail address, and telephone number. If you have an authorized agent who makes the request, then (i) we need proof that you have provided the agent with power of attorney; or (ii) you must provide the agent with signed permission to submit a request to know or delete; you must verify your identity directly with us; or you must confirm with us that you provided the authorized agent permission to submit the request.

During the verification process, we will try to match the information you provided against known information in our databases. If we still need additional information, we also may contact you or your authorized agent by e-mail or telephone number to ask you additional questions about the products or services you purchased or your last order with us, so that we can match your identity with the personal data we have about you. In some instances, we may ask you to declare under penalty of perjury that you are the consumer whose personal information is the subject of the request.

If we cannot verify your identity or sufficiently differentiate you from another consumer, or cannot confirm an agent's authority to act on your behalf, we are not required to fulfill your request.

9. Additional information for Nevada residents

Nevada residents have the right to opt out of the sale of certain "covered information" collected by operators of websites or online services. We currently do not sell covered information, as "sale" is defined by such law, and we do not have plans to sell this information.

10. Third-party platforms

This website may contain links, features, components or other interactive tools to websites maintained by outside organizations, including third-party social networks (such as Facebook, Twitter, LinkedIn), and that by using these you are providing your personal data to these third

parties and not to Alchemy. Please be aware that these third-party websites are governed by their own privacy policies and information practices different than Alchemy's. We are not responsible for the content or policies maintained by these websites. Please familiarize yourself with the privacy policy of any third-party website you visit, as it will govern any information you submit to that website.

11. Questions or comments about the Privacy Notice

Your privacy and security is important to us. We continually monitor customer feedback and seek to improve our services to meet your needs. If you have any questions or comments about Alchemy's Privacy Notice, the information practices of this website, your interaction with Alchemy's website, or our service providers, you can send an email to the data privacy office at: security.office@alchemysystems.com.

Our representative in the EU is [Insert name and contact details] and can be contacted at [Insert].