

# Rosetta Stone Website Privacy Policy

Rosetta Stone (UK) Ltd. (“Rosetta Stone”) takes the privacy of our customers seriously. We are committed to safeguarding your privacy while providing a personalized and valuable service.

## Overview

This Privacy Policy statement explains the data processing practices of Rosetta Stone. If you have any requests concerning your personal information or any questions about these practices please contact our Privacy Officer by e-mail at [privacyofficer@RosettaStone.com](mailto:privacyofficer@RosettaStone.com). We encourage you to periodically review this statement as it may change at any time at our sole discretion.

Our site contains links to third party sites, which are not subject to this privacy policy. Rosetta Stone does not endorse and is not responsible for the privacy practices or content on these sites. We recommend that you read the privacy policy of any such sites that you visit.

Information provided by you may be requested from one of our websites under the Rosetta Stone or Rosetta World brand names, or from one of our reputable co-marketing partner sites that represent our brands on their own websites under their company and/or brand name. In the event that you provide us with personal information for the purposes of free registration and you later make a purchase, whether directly from us or facilitated by one of our e-commerce partners, your privacy rights will be protected according to our stated policies and the stated privacy policies of these partners, which will be posted and available for your review at the time of purchase.

## Information Collected

Personal information is collected by Rosetta Stone. We collect personally identifiable information about you (your “Data”) through:

- The use of inquiry and registration forms.
- The purchase process when you buy any of our products or services

The provision of your details to us either online or offline The elements of your Data that we collect may include:

- Name
- Job title
- Company name
- Home, shipping and billing addresses, phone and fax number
- Mobile telephone number
- E-mail address
- IP address and browser information
- Payment details such as credit card information
- Market research data such as customer usage patterns

## **Use and Disclosure of Personal Information**

We use your Data for purposes which may include:

- Providing our customers with a personalized service.
- Processing orders, registrations and inquiries.
- Conducting market research surveys.
- Running competitions.
- Measuring interest in and improving our website, products, and services.
- Providing you with information about products and services we offer. You may stop the delivery of marketing emails by following the instructions accompanying a particular communication or by contacting us at [privacyofficer@RosettaStone.com](mailto:privacyofficer@RosettaStone.com).
- Resolving disputes, collecting fees, and troubleshooting problems.

We use the information you provide when placing an order to complete that order. We do not share this information with outside parties except 1. To the extent necessary to complete that order or to provide services where the outside party is acting on our behalf and has no independent right to use the information we provide (e.g., third-party shipping, business analytics, or customer support ), or 2. To successors in title to our business, or 3. In accordance with legal and regulatory requirements, or 4. As necessary, in Rosetta Stone's sole discretion, to protect the perceived rights, safety and property of Rosetta Stone, users of our websites, and the public, or 5. With the parent organization, affiliate or subsidiary entities of Rosetta Stone to manage and control Data as joint users.

Other than as set out above, you will be notified when Personal Information about you will be shared with third parties, and you will have an opportunity to choose not to have us share such information.

We also use information in aggregate form (so that no individual user is identified):

- To build up marketing profiles
- To aid strategic development
- To audit usage of the site

## **Use of Cookies and Other Tracking Devices**

We use cookies and other tracking devices, including local shared objects written with Adobe flash technology (flash cookies), to help personalize your use of our sites. A cookie is a small piece of information which is sent to your computer's hard drive by the web server so that the website can remember who you are. This information may include information relating to your

use of our sites, information about your computer such as the computer's IP address and browser type, demographic data and, if you arrived at our site via a link from a third party site, the URL of the linking page. We do not use any tracking devices to track your usage of the Internet on other sites not operated by Rosetta Stone. If you are a registered user this may include your name and email address for verification purposes.

We use information from cookies for purposes which may include:

- Identifying returning users and registrants
- Enabling you to move more easily around our site
- Tracking your use of our site to better develop our sites in accordance with your requirements
- Building up a demographic profile
- If you do not want to help us learn how to improve our site, products, offers and marketing strategy, you may choose to set your Web browser to not accept cookies. Further information on how to prevent cookies from being stored on your computer can be found on <http://www.allaboutcookies.org> under the 'manage cookies' section. Alternatively, go to the help menu within your Internet browser. Flash cookies may be removed using the latest versions of Google Chrome, Mozilla Firefox, and Microsoft Internet Explorer, which you may upgrade to on these browsers, or you may remove or block flash cookies by going to Adobe's Website Storage Settings Panel.

From time to time we may permit third party companies to set cookies on Rosetta Stone sites for purposes which may include market research, revenue tracking or to improve functionality of the site.

## **Security Policy**

Rosetta Stone has appropriate measures in place to help ensure that our users' Data is protected against unauthorized access or use, alteration, unlawful or accidental destruction and accidental loss. Although we make reasonable efforts to protect your Personal Information from loss, misuse, or alteration by third parties, you should be aware that there is always some risk involved in transmitting information over the Internet. There is also some risk that thieves could find a way to thwart our security systems.

## **Transfer of Data**

The Internet is a global environment. Using the Internet to collect and process personal Data necessarily involves the transmission of Data on an international basis. For individuals located in the European Union, we participate in the EU-U.S. and Swiss-U.S. Privacy Shield Framework (the "Framework") as set forth by the U.S. Department of Commerce regarding the collection, use and retention of personal data from the European Union and Switzerland. For more information about our certification to the Framework, please click

here: <http://www.rosettastone.com/privacy-shield>, or to visit the U.S Department of Commerce site please click here: <https://www.privacyshield.gov/welcome>.

## Access to Data and Contact Info

You may request a copy or send a correction of the personal information we hold about you by contacting the Privacy Officer at [privacyofficer@RosettaStone.com](mailto:privacyofficer@RosettaStone.com) or writing to:

Privacy Officer  
Rosetta Stone Ltd.  
135 West Market Street  
Harrisonburg VA 22801  
USA

Where required by applicable law, and notably by GDPR, you have the right to obtain confirmation of the existence of certain Personal Data relating to you, to verify its content, origin, and accuracy, as well as the right to access, review, port, delete, or to block or withdraw consent to the processing of certain Personal Data (without affecting the lawfulness of processing based on consent before its withdrawal), by contacting us as detailed below. **In particular, you have the right to object to our use of Personal Data for direct marketing and in certain other situations at any time. Contact us below for more details.** Please note that certain Personal Data may be retained as required or permitted by applicable law.

If you are an End User receiving access to our services through a Corporate, Governmental, Educational or other Organizational Enterprise Client of Rosetta Stone, and you wish to request access, limit use, limit disclosure or remove your End User Personal Data, please contact the Enterprise Client organization that submitted your personal data to us, and we will support them as needed in responding to your request.

If you have questions or requests concerning your personal information, please contact the Privacy Team by email at [privacyofficer@rosettastone.com](mailto:privacyofficer@rosettastone.com).

If you are a European resident with questions regarding your rights in Personal Data under GDPR, please contact the Rosetta Stone Data Protection Officer by email at [DPO@rosettastone.com](mailto:DPO@rosettastone.com).

- (a) As noted above, you can choose not to provide RSL with personal information, although it may be needed to register as a member on the Service and to participate in certain features offered through the Service.
- (b) You can access or update your personal information by sending an email to [privacyofficer@rosettastone.com](mailto:privacyofficer@rosettastone.com).
- (c) You may stop the delivery of commercial email communications that RSL sends by following the instructions accompanying a particular communication or by contacting us at [privacyofficer@rosettastone.com](mailto:privacyofficer@rosettastone.com).

- (d) The Help portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether.

We may charge the allowable fee under applicable law for provision of this information.

### **Children Under 13**

We do not intentionally collect any information on children under 13 years of age. We will undertake to delete any details of such users where a parent or guardian has notified us that any such details have been obtained.

### **Changes to this Policy**

This policy is effective May 25, 2018. From time to time we may make changes to this privacy policy statement to reflect any changes to our privacy practices in accordance with changes in legislation, best practice or website enhancements. We will notify you about material changes to this Privacy Policy by sending a notice to the email address you provided to us or by placing a prominent notice on our website.