



CEU-HQ, LLC Privacy Statement

Commitment to Privacy and Security

CEU-HQ, LLC is committed to safeguarding the privacy and security of the information we collect. This statement explains the policies we follow with respect to the handling of customer information collected by **CEU-HQ, LLC**. By visiting, using and providing information to **www.CEU-HQ.com** you are accepting the practices in this Privacy Statement and our Agreement of Terms Of Use.

Information We Collect

The personal information we collect is strictly related to our business of providing on-line continuing education and enabling you to utilize the features of **www.CEU-HQ.com** such as the creation of a User Account, purchasing courses and receiving offerings and/or other educational information from **www.CEU-HQ.com** or select associated partners. **CEU-HQ, LLC** will not use the personal information you provide for other purposes without your consent.

The transaction information we receive may include personal financial information (e.g., credit or debit card account numbers) that will be shared with our secure, on-line, payment processing partner. **CEU-HQ, LLC** does not maintain any account numbers beyond the period required to complete the transaction.

CEU-HQ, LLC will not disclose "Order Information" to any third party, except to facilitate and complete transactions or to comply with federal, state and local laws or the rules and regulations of the respective card organizations or other payment entities (e.g. Visa, MasterCard, American Express, NACHA, etc.). **CEU-HQ, LLC** understands that such information is sensitive and takes appropriate steps to protect the confidentiality and security of all information collected in accordance with this Privacy Statement.

Use and Disclosure of Information

Use and disclosure of the information collected by **CEU-HQ, LLC** varies based on the information source and type, as set forth below:

1. **Browsing the Website.** When you browse **www.CEU-HQ.com**, we may collect information regarding the domain and host from which you access the Internet, the Internet Protocol address of the computer or Internet Service Provider you are using, and anonymous site statistical data. In addition, we may collect information that you voluntarily provide us via online forms and questionnaires. **CEU-HQ, LLC's** website is intended for commercial use only, and we collect, retain and use information about visitors to our websites only for specific business purposes, including: (i) to respond to requests for information about our products and services (see "Your Inquiries" below), (ii) to administer the website or improve site performance, (iii) to provide customer support (e.g., to allow you to complete an online purchase, to allow you to view and manage accounts, or to help enhance our products and services); (iv) for security purposes and to combat fraud (e.g., to protect against unauthorized access to **CEU-HQ, LLC's** systems, accounts and information. In addition, when you link to **www.CEU-HQ.com** website from the website of any third-party advertiser, we may receive information about you from such third-party, including your contact information and information stored in "cookies" on such third-party's website. Please check the privacy policy of these websites concerning what information may be collected by the third-party and

shared with **CEU-HQ, LLC**. Such information is used by us only for the purposes set forth above with respect to information collected directly from you at our own website.

2. **Your Inquiries.** When you complete and submit a form on our website, send us an e-mail, send us a fax, or contact us by telephone to solicit information about our services or the company in general, **CEU-HQ, LLC** may store the inquiries and their contents. Information you submit via an inquiry is collected only with your knowledge and active participation, and may be used by **CEU-HQ, LLC** to respond to your inquiries, to contact you, to inform you of services of **www.CEU-HQ.com** or its partners that may be of use to you, and for similar business purposes. Information collected during the course of an inquiry will not be disclosed to any third party; provided that such information may be shared internally with our affiliated entities for the business purposes set forth above.

Protection of Cardholder and Customer Data

CEU-HQ, LLC's payment processing partner has implemented various measures, including appropriate administrative, technical and physical safeguards, designed to ensure the security and confidentiality of cardholder and customer data, protect against anticipated threats or hazards to the security or integrity of such information, and protect against unauthorized access to or use of such information. Such measures may include, among others, encryption, physical access security and other appropriate technologies. **CEU-HQ, LLC's** payment processing partner continually reviews and enhances its security systems, as necessary and is subject to the detailed rules and regulations of the various credit and debit card organizations and networks (i.e. VISA, MasterCard, American Express, NYCE, Star, etc.), relating to the security and safeguarding of cardholder information, including the Payment Card Industry Data Security Standards ("PCI"), VISA U.S.A.'s Cardholder Information Security Program ("CISP") and MasterCard International's Site Data Protection Program ("SDP").

CEU-HQ, LLC's payment processing partner is required to undergo periodic third-party assessments and periodic network scans to ensure that, among other things, has installed and maintains a firewall configuration to protect data; does not use vendor-supplied defaults for system passwords and other security parameters; protects stored data; encrypts transmission of cardholder data and sensitive information across public networks; uses and regularly updates anti-virus software; develops and maintains secure systems and applications; restricts access to data to those with a business need-to-know; tracks and monitors all access to network resources and cardholder data; regularly tests security systems and processes; assigns a unique ID to each person with computer access; restricts physical access to cardholder data; and maintains a policy that addresses information security. Additional information regarding the requirements of VISA's CISP and MasterCard's Site Data Protection program (SDP) can be found on the VISA USA and MasterCard International Web sites.

Additional Internet Privacy Policies

Cookies. The **CEU-HQ, LLC** website may create a small data file, or "cookie", on the hard drive of your computer in order to retain information that is used by our website. **CEU-HQ, LLC** uses cookies for a number of purposes, including to:

- Access your information when you "log in", so that we can provide you with customized content in online areas.
- Display the most appropriate banners and course offerings based on your activity while on **www.CEU-HQ.com**.
- Conduct research to improve **www.CEU-HQ.com** content and services.

Third-Party Web Sites. **CEU-HQ, LLC** may create links to third-party web sites. In addition, **CEU-HQ, LLC** may authorize third parties to create links to **www.CEU-HQ.com**. **CEU-HQ, LLC** is not responsible for the content or privacy practices employed by third-party web sites. Neither does **CEU-HQ, LLC** control or warrant the utility, merchantability or workmanship of the products or services offered at third-party web sites.

Online Advertising. **CEU-HQ, LLC** also may use cookies to track advertising leads and campaigns from banner advertisements and third party advertisement services. **CEU-HQ, LLC** may hire third party companies such as advertising services to track and report performance of advertising and marketing campaigns to and from **www.CEU-HQ.com** and third party web sites. These companies may also set cookies and use related technology, such as tracking pixels.

These tracking pixels (also known as action tags, web beacons, or transparent GIF files) and other similar tracking technologies may be used to collect and store information about user visits, such as the user's anonymous cookie ID, page visits and duration, and the specific ad or link(s) that the user clicked on to visit the site. No personally identifiable information is stored on these cookies or web pixels. This user activity information is reported to us in aggregate and is anonymous. We use this information in aggregate to understand, for example, the effectiveness of our advertising and marketing.

Children. **CEU-HQ, LLC** does not solicit or knowingly accept information from persons under the age of eighteen (18). Our web sites are not designed with the intent to attract or encourage viewing by children.

Modifications to Privacy Policy

We continue to review our policies and procedures to assure that they are effective in meeting our commitments to our customers. **CEU-HQ, LLC** reserves the right to change this privacy policy without notice at any time and from time to time, including as needed to comply with the rules and regulations of the various debit and credit card organizations, or to comply with applicable local, state and federal laws and regulations.

Arbitration

Any dispute, claim or other civil action related to this Privacy Policy and/or other actions of **CEU-HQ, LLC** are subject to final and binding arbitration. You and **CEU-HQ, LLC** shall select the arbitrator. Neither you nor **CEU-HQ, LLC** shall be entitled to any punitive, indirect or consequential damages including but not limited to damage to business and/or loss of revenue related to this Privacy Policy. This Privacy Policy shall not be considered unlawful or unenforceable in aggregate if a portion is deemed unlawful or unenforceable.

Inquiries

If you have a question or comment regarding this Privacy Statement, please contact:

CEU-HQ, LLC
Chief Compliance Officer
4611 Bee Cave Rd.
Austin, Texas 78746

(Last modified August 30, 2009)