## **Privacy Policy**

## Effective Date: October 1, 2020

This Privacy Policy sets forth our current privacy practices as it relates to the collection of personal and other information that may occur when you interact with RCI Institute, which consists of (a) RCI Institute, LLC. and its subsidiaries, including their respective businesses and operations (collectively, "RCI Institute"); (b) businesses and operations managed or operated by RCI (c) websites owned, operated and managed by RCI, including each website that links to this Privacy Policy (collectively, "RCI Websites"); and (d) RCI content, software and mobile applications ("RCI Apps").

## **Acceptance of Terms**

By accessing WWW.HeadTrash.Com you acknowledge and fully understand Company's Privacy Statement and freely consent to the information collection and use practices described in this Website Privacy Policy

Please read the RCI Institute Terms and Conditions carefully before you start to use the RCI Websites. By accessing and using the RCI Websites or any online account you create on the RCI Websites, you accept without modification all the terms, conditions, and notices contained in these Terms and Conditions. If you do not agree to RCI Institute Terms of Service or the RCI Institute Privacy Policy, you must not access or use the RCI Websites. Accordingly, under the General Data Protection Regulation, or "GDPR," users in the European Union ("EU") acknowledge and consent to RCI Institute's processing of personal data by RCI Institute as necessary for the legitimate interest of performing our services to you.

# **Modification of Privacy Policy.**

RCI Institute may update or change the Privacy Policy from time to time to reflect changes in the services, changes in the law, or for other reasons as deemed necessary by RCI Institute, in its sole discretion. Your continued access to or use of the Website after any such change shall constitute your consent to such change. Unless explicitly stated otherwise, any new features that change or improve the RCI Websites shall be subject to this Privacy Policy.

#### What Information Do We Collect?

RCI Institute collects information from and about its users in several ways depending on how you choose to interact with RCI Websites.

#### **Personal Information**

Visitors to RCI Websites may need to register and setup user accounts to purchase certain products and services. In these circumstances you will be required to provide personal information, such as your name, e-mail address, billing address, shipping address, phone number, credit card or bank account information, date of birth and other persistent identifiers that can be used to personally identify you.

#### **Responses to Test Questions and Surveys**

We collect your responses to test questions and surveys on RCI Websites and store these, along with your scores. You are not required to provide us with any of this data.

## **Usage Information**

We may also collect other personal information regarding your interaction with RCI Websites, Devices and Apps, including the items that you browse, purchase, download, read, watch, and otherwise access, and your geographic location. RCI Institute may also use cookies to personalize or enhance your user experience.

#### How we use information?

The intended uses of your information, which you voluntarily provided to RCI Institute, are outlined below:

**Test answers and scores** - Your individual results will be provided to you only. For research, whitepapers, reports, lectures, presentations, websites, and other like uses, your data will be aggregated with other individual and group data.

**Test and survey information** - Your individual results will be provided to you only. For research, whitepapers, lectures, presentation, websites, and other like uses, your data will be aggregated with other individual and group data.

**Personal Information** - Your personal Information will be used for Identification on RCI Websites and to fulfill product and service orders.

RCI Institute may share with third parties and the public information that has an individual's identification removed or has been aggregated with other information.

RCI Institute reserves the right to provide your data to third parties that have agreed to maintain such information in confidence and use such information solely in performance of services to us as described below:

• Other entities included but are not limited to Powered by Aspire, LLC, HeadTrash.LLC, Aspire People Performance, Profits, LLC.

- We provide personal information to our third-party partners that work under contract on our behalf to provide certain product and service offerings or technologies we use in or programs.
- To protect our customers, RCI Institute and our third-party partners from liability or to defend ourselves as part of investigations.
- To provide payment and shipping information to fulfill your requests for products and services
- To comply with the law, regulation, legal process, or enforceable governmental request
- As required to support a merger, acquisition, or liquidation of the company

We may ask if you would like us to share your information with other unaffiliated third parties who are not described elsewhere.

## How we protect Information

No method of transmission over the Internet, or method of electronic storage, is fully secure. While we use reasonable efforts to protect your personal information from unauthorized access, use, or disclosure, we cannot guarantee the security of your personal information.

We use commercially reasonable procedures to protect the information that we collect from you against loss, theft, and misuse, as well as unauthorized access, disclosure, alteration, and destruction. We have developed and implemented a security program applicable to all records containing personal information. You can help us by taking precautions to protect your personal information when you are on the Internet and only disclose information that you want made public. Change your passwords often using a combination of letters and numbers and make sure to use a secure web browser.

You are responsible for maintaining the confidentiality of your password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or account.

#### Policies for Minors, including children under the age of 13

RCI Institute does not knowingly solicit or collect information from children under the age of 13, and is committed to complying with all applicable laws and regulations regarding the collection, storage and use of personal information of Minors under the age of 13, including the Children's Online Privacy Protection Act of 1998

### **Your California Privacy Rights**

California Civil Code 1798.115(c), 1798.130(a)(5)(c), 1798.130(c), and 1798.140 indicate that organizations should disclose whether certain categories of information are "sold" or transferred for an organization's "business purpose" as those terms are defined under California law. Please note that because this list is comprehensive it may refer to types of information that we share about people other than yourself. If you would like more information concerning the categories of personal information (if any) we share with third parties or affiliates for those parties to use for direct marketing please submit a written request to us using the information in the "Contact Information" section below. We do not discriminate against California consumers who exercise any of their rights described in this policy.

#### Contact.

If you have any questions about our privacy policy or RCI Institute Materials, please contact us at info@rciinstitute.com