



348 NORTH MAIN ST. | ANDOVER MA. 01810 | 978.409.0850

## VAIN Academy Privacy Policy

### Privacy Statement Updated 1.20.23

Welcome to VAIN Academy, LLC ("VAIN," or the "Company"). Your privacy is important to us. In Part I of this Privacy Statement, we set forth the Company's Privacy Policy as to Personal Information collected online through [vainmedispa.com](http://vainmedispa.com), VAIN's mobile application, or other Company websites that link to this Privacy Statement from their site (collectively, "Company Websites").

In Part II of this Privacy Statement, we set forth the Company's Privacy Policy as to Personal Information collected other than through Company Websites.

The Company will not discriminate against you for exercising any right you have under this Privacy Statement or applicable law.

"Personal Information" is any information that enables us to identify you, directly or indirectly, by reference to an identifier such as your name, identification number, location data, online identifier or one or more factors specific to you. Personal Information includes "sensitive Personal Information" and "pseudonymised Personal Information" but excludes anonymous information or information that has had the identity of an individual permanently removed.

Your use of Company Websites and/or provision of your Personal Information or sensitive Personal Information to the Company constitutes your consent to the use, storage, processing and transfer of that information in accordance with this Privacy Statement.

For the purposes of the EU General Data Protection Regulation 2016/679 (the "GDPR"), except as otherwise expressly stated, the data controller is VAIN Academy, LLC with an office at 348 North Main Street, Andover, MA 01810. VAIN is an organization based in the United States. Any affiliates of the Company have also adopted this Privacy Statement. Where your data is being collected and used by one of the affiliates, all references to the Company herein shall mean the respective affiliate.

### QUESTIONS

If you have any questions or complaints regarding this Privacy Statement, please contact us at [info@vainacademy.org](mailto:info@vainacademy.org). If you have any questions about the Company Websites, please contact us at [info@vainacademy.org](mailto:info@vainacademy.org), by phone at 978-409-0850 or by mail to: VAIN Academy, LLC, 328 North Main Street, Andover, MA 01810.

### CHANGES TO THIS PRIVACY STATEMENT

We will update this Privacy Statement from time to time, so please check back periodically.

If at any point we decide to use Personal Information in a manner that is materially different from that stated at the time it was collected, we will endeavor to notify you of such changes (e.g., we will post a revised Privacy Statement with a new effective date, display the word "updated" next to the Privacy Policy link on each page on the Company Websites, or otherwise) prior to implementing them.

## PART I – VAIN WEBSITES PRIVACY POLICY

Throughout the Company Websites, there are forms for visitors to request information, products, and services. We use Personal Information from these forms to provide the information, products, and services you request.

Forms on the Company Websites that request financial information do so in order to bill you for products or services ordered. Unique identifiers (such as your email) are collected from website visitors to verify the user's identity for access to restricted content or features on the Company Websites.

This Privacy Policy discloses VAIN's privacy practices and contains detailed information about the following:

- What information do we collect?
- What are "cookies" and how does Company use them?
- Do we share information with third parties?
- How do we use the information we collect?
- How can you review and modify your Personal Information or opt out of Company Websites?
- What privacy rights apply to residents of other jurisdictions?
- What types of security procedures are in place to protect against the loss, misuse or alteration of your information?
- How long do we keep your Personal Information?
- What is our policy on collecting information of children under 13?

### 1. What information do we collect?

Company Websites collect the following Personal Information about site visitors:

- a) Site Use Information

The Company collects technical information relating to each time a visitor comes to a Company Website, including IP address, browser type and version, time zone settings, browser plug-in types and versions, operating system and platform type (e.g. Internet Explorer browser on a Windows platform).

We may also collect information about your visit, including pages you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to contact us.

Gathering this technical information helps us to learn what browsers we need to support and helps us determine what sections of the Company Websites are most popular and how many visitors come to our sites. You do not have to register with the Company Websites before we can collect this information.

- b) Information Provided to the Company

You may provide Personal Information to us including your name, home and/or work email address, postal address, phone number and/or fax number, your employer and job title, demographic information about you including birth year, etc., and if you are making a purchase, your credit card or other financial information. Such information is only required to take advantage of optional products and services provided through the Company Websites. You may also provide Personal Information when you contact the Company by email, social media, or any similar technologies, including when you mention VAIN on social media.

The Company collects Personal Information in the following ways from different parts of the Company Websites:

- **Registration:** When registering for specific services we may ask for Personal Information. For example, if you subscribe to an e-mail newsletter, we will ask you to provide your e-mail address.
- **Online Purchases:** When you make an online purchase or when you subscribe to a Company publication through the Company websites we may also ask for the same type of Personal Information. The number and variety of useful services on the Company Websites that may require the collection of Personal Information about you will continue to grow in the future.
- **Employment Applications:** When you apply for employment with the Company using the Company Websites, we may ask for your Personal Information, including copies of your Resume or CV, and any other information required to verify your qualifications.

### 2. What are "cookies" and how does the Company use them?

A cookie is a small text file containing a unique identification number that is transferred from a website to the hard drive of your computer. This unique number identifies your web browser to Company computers whenever you visit the Company Websites.

The use of cookies is an industry standard, and cookies are currently used on most major websites. Most web browsers are initially set up to accept cookies. If you prefer, you can reset your browser to notify you when you have received a cookie. You can also set your browser to refuse to accept cookies altogether.

While the Company does not require you to use cookies, keep in mind that certain services will not function properly if you set your browser to refuse all cookies. To help serve you better, the Company generally uses cookies to:

- Identify return visitors. Cookies let us remember your web browser so we can provide personalized online services.
- Display advertisements. The Company may use an outside ad company to display Company-approved ads on our website and other websites. While we use cookies on other parts of our website(s), the cookies received with banner ads are collected by our ad company. These cookies allow the Company to manage the delivery of ads.

For more information about how we use cookies on the Company Websites, please see our Cookie Policy.

### 3. Do we share information with third parties?

Personal Information collected through the Company Websites is generally collected and maintained solely by the Company or its contracted vendors.

We may share Personal Information in the following ways:

- a) Information You Give Us

1. Personal Information provided when you register for services or products. When you provide Personal Information about you on the Company Websites to register for a service, buy a product, or take advantage of a promotion, the Company will share such Personal Information as necessary to the complete the transaction requested by you. The Company also reserves the right to sell or otherwise provide to selected third parties, mailing/information lists derived from such registrations. These third parties may contact you directly regarding their products and services.

If you wish to opt out of the sale/distribution of such lists to third parties at any time, you may do so by following the directions in Item 6 below. We will not share Personal Information relating to individuals based in the EU or the United Kingdom (the "UK") unless you have provided your opt-in consent.

2. Information provided when you apply for employment with the Company. If you apply for a position with the Company, you may provide Personal Information required to verify your employment qualifications, including copies of your Resume or CV, in order to do required background checks and education and employment verification, including your employment status, as required by law or Company policy. The Company does not sell or share Personal Information related to employment applications except as necessary to process the application, to conduct the required background checks and education and employment verification, or as necessary to comply with legal obligations.

- b) Site Use Information

We disclose to third-party sponsors/advertisers aggregate statistics (i.e., impressions and click-throughs on a company's advertisement).

In addition, we may share aggregate website statistics with other third parties. We do not disclose Personal Information to these sponsors/advertisers or other third parties as part of this process, only information in an aggregate form.

- c) Company Affiliates

We also allow our affiliates, Zenoti to use the information you may provide when you register for services or products to the same extent as the Company may use such information under this Privacy Policy, and fully subject to the same limits as the Company is subject to on the use of such information under this Privacy Policy. Similarly, our affiliates may share information with us, which may be used to the same extent as the affiliate, and fully subject to the same limits as the affiliate. To the extent that information is shared by an affiliate with the Company, such data will be stored and processed in the U.S.

### 4. How do we use the information we collect?

We use your Personal Information according to the terms of the Privacy Policy in effect at the time of our use. We will only process your Personal Information, including sharing it with third parties, where (1) you have provided your consent which can be withdrawn at any time, (2) the processing is necessary for the performance of an agreement to which you are a party, (3) we are required by law, (4) processing is required to protect your vital interests or those of another person, or (5) processing is necessary for the purposes of our legitimate commercial interests, provided your interests and fundamental rights do not override those interests.

We use Personal Information for the following purposes:

- a) Information You Give Us

We use the Personal Information you give us:

1. to carry out our obligations arising from any agreement entered into between you and us
2. to provide you with the information, products and services you request from us
3. to arrange and deliver conferences, events and programming relevant to your job and subjects of interest
4. to respond to your questions and provide related customer services
5. to improve the Company Websites
6. to send you Company publications, information about special offers, and other information that the Company believes is relevant and useful to its clients, where you have not opted out of receiving such information; we may automatically process your information to determine which products and services may be of most use to you. You may object to such processing by contacting us at [info@vainacademy.org](mailto:info@vainacademy.org).
7. to send you third-party information the Company believes is relevant and useful to you, where you have given your consent
8. to ask you to provide feedback
9. to enable you to partake in a prize draw, competition or complete a survey
10. to administer and protect the Company's business and websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)
11. for those who apply for employment with the Company, to process your employment application, including background checks and education and employment verification, as applicable
12. to comply with all applicable laws or legal processes, including providing information on individual users to the appropriate governmental authorities where required by law enforcement or judicial authorities.
13. in matters involving a danger to personal or public safety, or to protect the rights, property or safety of the Company, our clients, employees, or others, the Company may voluntarily provide information to appropriate governmental authorities

- b) Site Use Information

As mentioned above, the Company uses the aggregate, anonymous data collected to let our sponsors/advertisers know the number of impressions or views and the number of "click throughs" on their advertisement(s).

The Company also uses this aggregate, anonymous data to perform statistical analyses of the collective characteristics and behavior of visitors to the Company Websites; to measure user interests regarding specific areas of the Company Websites; and to analyze how and where best to use our resources.

Without such data, we would not know which parts of the Company Websites are the most popular, and we would not be able to change and update the content and services appropriately.

- c) Exceptions

On occasion the Company collects Personal Information through the Company Websites with the intent to afford a greater degree of privacy for such information than is otherwise set forth in this privacy policy.

In those relatively rare situations where the Company does so it will clearly disclose to you at the time it collects such information, what degree of privacy will be afforded to the Personal Information collected at such time, and the Company will follow a process to assure that the specifically disclosed degree of privacy is, in fact, afforded to such information.

### 5. How can you review and modify your Personal Information or opt out of Company Websites?

Please contact us if you wish to (a) modify or cause to be deleted Personal Information or demographic information previously provided by you to the Company or its affiliates; or (b) opt out of communications from the Company or our partners. You have the following options for doing so:

1. E-mail: [info@vainacademy.org](mailto:info@vainacademy.org)
2. Send mail to the following postal address: VAIN Academy, LLC, 348 North Main Street, Andover, MA 01810
3. Call: 978-409-0850

### 6. What privacy rights apply to residents of other jurisdictions?

**For California Residents Only.** The Company may disclose your Personal Information to our affiliates or other third parties who may use that information to market directly to you. As a California resident, you have the right to opt out of having your Personal Information licensed to such third parties. We will not share your information after we have received your notification that you wish to opt out. If you wish to opt out you have the following options:

1. E-mail: [info@vainacademy.org](mailto:info@vainacademy.org)
2. Send mail to the following postal address: VAIN Academy, LLC, 348 North Main Street, Andover, MA 01810
3. Call: 978-409-0850

**For European or United Kingdom Residents Only.** If you are based in the EU or the UK, in certain circumstances, you have rights under the GDPR in relation to your Personal Information.

- **Request access to your Personal Information.** You may have the right to request access to any Personal Information we hold about you as well as related information, including the purposes for processing the Personal Information, the recipients or categories of recipients with whom the Personal Information has been shared, where possible, the period for which the Personal Information will be stored, the source of the Personal Information, and the existence of any automated decision making.
- **Request correction of your Personal Information.** You may have the right to obtain without undue delay the rectification of any inaccurate Personal Information we hold about you.
- **Request erasure of your Personal Information.** You may have the right to request that Personal Information held about you is deleted.
- **Request restriction of processing your Personal Information.** You may have the right to prevent or restrict processing of your Personal Information.
- **Request transfer of your Personal Information.** You may have the right to request transfer of Personal Information directly to a third party where this is technically feasible.

Where you believe that we have not complied with our obligations under this Privacy Policy, or under European or UK data protection laws, you have the right to make a complaint to an EU or UK Data Protection Authority, such as the UK Information Commissioner's Office.

If you wish to exercise your European or UK data subject rights, you have the following options:

1. E-mail: [info@vainacademy.org](mailto:info@vainacademy.org)
2. Send mail to the following postal address: VAIN Academy, LLC, 348 North Main Street, Andover, MA 01810
3. Call: 978-409-0850

### 7. What kinds of security procedures are in place to protect against the loss, misuse or alteration of your information?

The Company Websites have security measures equal to or better than those reasonably expected in the industry, such as firewalls, in place to protect against the loss, misuse and alteration of your Personal Information under our control. While we cannot guarantee that loss, misuse or alteration to data will not occur, we take reasonable precautions to prevent such unfortunate occurrences. Certain particularly sensitive information, such as information collected for a commercial transaction, is encrypted prior to transmission.

You are ultimately responsible for the security of your Company login credentials. You should log out of your browser at the end of each session to ensure that others cannot access your Personal Information, especially if you share a computer with someone else or are using a computer in a public place like a library or internet cafe.

Our website may link to external sites that are not operated by us. Please be aware that we have no control over the content and policies of those sites, and cannot accept responsibility or liability for their respective privacy practices.

### 8. How long do we keep your Personal Information?

We keep your personal information only for as long as we have a reasonably necessary for business purposes. This time period may depend on what we are using your information for, in accordance with this privacy policy. If your personal information is no longer required, we will delete it or make it anonymous by removing all details that identify you.

If necessary, we may retain your personal information for our compliance with a legal, accounting, or reporting obligation.

### 9. What is our policy on collecting information of children under 13?

We do not aim any of our products or services directly at children under the age of 13, and we do not knowingly collect personal information about children under 13.

## PART II – VAIN PRIVACY POLICY FOR INFORMATION COLLECTED OTHER THAN THROUGH COMPANY WEBSITES

If you submit Personal Information to the Company through any channel other than the Company Websites, the same privacy rules set forth at Part I above for the Company Websites will be applied to such Personal Information you submit through channels other than the Company Websites (including without limitation your opt-out rights at Part I, Section 6 above), except as follows:

1. The "cookies" and other tracking devices used by the Company Websites and described in Part I above do not apply to Personal Information gathered through channels other than the Company Websites.
2. Hardcopy Personal Information provided to the Company that is not converted to electronic media and hosted by the Company will be subject to different security procedures than will stored electronic Personal Information. The Company has security measures equal to or better than those reasonably expected in the industry, in place to protect against the loss, misuse and alteration of your hardcopy Personal Information under our control.
3. When the Company collects Personal Information through channels other than the Company Websites, it may in some instances apply a different privacy policy to such information; but where it does so it shall conspicuously disclose to you at the time of collection what privacy policy will apply to such information.

Privacy Policy Effective 1.20.23. Updated 1.20.23.