



PRIVACY POLICY

This Online Sign-up page is powered by BGBC.

By signing up on this Online Sign-up Page, you (the "subscriber") are subscribing to the distribution list(s) managed by the BGBC user. By subscribing, you are giving explicit permission for this user to send you messages via BGBC service.

To begin receiving messages from this subscription, each form of contact information that you have provided must be verified by you. If your contact information is not verified, you will not receive messages from this subscription.

Receiving mobile text messages from this user via BGBC is completely FREE of charge. However, standard text messaging rates from your wireless carrier still apply.

NOTE: The BGBC service is not intended for children under 13, and BGBC does not knowingly collect information from children under the age of 13. Some BGBC users may classify and rate their message content for recipients who are 21 years of age or older. Please observe content rating for intended audience before you sign up for any distribution list or mobile keyword. Information Collection and Your Privacy

Your contact information is collected by the BGBC user on an opt-in basis in two ways:

1. BGBC users can collect your first name, last name, phone number, instant message ("IM") screen name, email address, and other custom data when you willingly subscribe to the BGBC user's Online Sign-up Page ("OSP").

2. BGBC user can also collect your mobile number when you text the BGBC user's mobile keyword to BGBC's short code. Certain SMS text features enable the collection of name, IM screen name, email address, or other customized information by asking you to reply via SMS texts with specific information.

NOTE: Message and data rates may apply.

Process to Unsubscribe From BGBC

You have the ability to unsubscribe or change your personal subscription settings at any time. To unsubscribe for:

- Email: Click the 'Unsubscribe' link located at the bottom of each email. 'Block' link removes your contact information and additionally prevents the same list from adding you again.
- Mobile Text: Text STOP to the short code that you do not wish to receive



PRIVACY POLICY

messages from. NOTE: Message and data rates may apply.

- IM: Click the 'Unsubscribe' link located at the bottom of each instant message. 'Block' link removes your contact information and additionally prevents the same list from adding you again.

- Voice Broadcasts: Follow the voice instruction/prompt when you receive a broadcast call. Press 7 to unsubscribe from voice broadcast messages. You may also call 1-800-764-3090 to unsubscribe from prerecorded calls.

If you believe that your contact information was collected by a BGBC user without your consent and would like to report spam, please email support@chairmansacademy.com. When reporting the offending organization, please include the contact address or number that sent you the spam, the username of the sender, and the message or first few sentences of the message that you consider spam. BGBC has a no tolerance spam policy.

Your Privacy

BGBC DOES NOT share your name or any contact information (including names, email, instant message screen name, and telephone number) with others except for the very owners of the Online Sign-up pages or the mobile keywords through which you volunteered your information. You have given them ("BGBC users") explicit permission to send messages to your contact information when you signed up. If the BGBC user added or imported your information without your permission, you can block the user from adding or importing it again. If this happened, please report the BGBC. BGBC believes in a spam-free communication environment.

If you would like to change permission to share, click on "Unsubscribe" link at the bottom of any email message you receive via BGBC service. Change your privacy settings by unchecking "Allow access to my contact information."

BGBC may use or disclose information about you, including your personal information, under the following circumstances:

- To provide you with products and services you request.
- To anticipate and resolve problems and conflicts with our products and services.
- For verification and authentication purposes in regards to requests or changes of any personal information or data related.
- For other purposes communicated to you at the time you provide or authorize the use of your information.
- To enforce our Terms of Use and Privacy Policy or other legal agreements.
- To outsource any of the tasks referenced in this Terms of Use and Privacy Policy, such as customer service.



PRIVACY POLICY

- In response to a subpoena, court order, or other legal process.
- To establish or exercise our legal rights or defend against legal claims.
- To share with a company controlled by, or under common control with BGBC for any purpose permitted by our Terms of Use.
- When BGBC believes such use or disclosure is (a) necessary in order to investigate, prevent, or take action regarding suspected illegal activities, fraud, or situations involving potential threats to the physical safety of any person, or (b) required by law.
- In the event of a merger, acquisition, consolidation, divestiture, or bankruptcy of BGBC.

When a BGBC user sends you messages, the message may include a web beacon to determine the number of people who open them. When you click on a link, BGBC or its user may record this individual response to customize special offerings to you. Web beacons collect only limited information, such as a cookie identifier, time and date of a page being viewed, and a description of the page on which the web beacon resides (the URL). Web beacons can be refused. If you do not wish to receive web beacons via email, you will need to disable HTML images or refuse HTML (select Text only) emails via your email software.

BGBC offers services enabling its users to send messages via multiple modes of communications - mobile text, email, recorded voice message, and instant message (“IM”). This privacy policy is for those who received a message from a BGBC user, similar in nature to messages that you may receive from someone who uses Gmail, Yahoo, AIM, and other messaging channels. BGBC is dedicated to protecting personal information and will make every reasonable effort to handle collected information appropriately. All collected information will be handled as carefully, securely and efficiently as possible.

If you believe you have received unwanted, unsolicited messages from the BGBC system, please forward a copy of that email with your comments to support@chairmansacademy.com, and BGBC will take an appropriate action.

Information Collection

Your contact information (belonging to you, the subscriber) is collected by a BGBC user on an opt-in basis and can be collected in different ways:

- BGBC users can collect your first name, last name, phone number, instant message (“IM”) screen name, email address, and other custom data when you willingly subscribe to the BGBC user’s Online Sign-up Page (“OSP”).
- BGBC user can also collect your mobile number when you text the BGBC user's mobile keyword to BGBC's short code. Certain SMS text features enable the



PRIVACY POLICY

collection of name, IM screen name, email address, or other customized information by asking you to reply via SMS texts with specific information.

NOTE: Message and data rates may apply.

- BGBC user may have previously collected your contact information on an opt-in basis outside of the BGBC system. The user states that your contact information was collected with your permission and you have consented to receive messages from the user.

Process to Unsubscribe From BGBC

All subscribers have the ability to unsubscribe or change their personal subscription settings at any time.

To unsubscribe for:

- Email: Click the 'Unsubscribe' link located at the bottom of each email. 'Block' link removes your contact information and additionally prevents the same list from adding you again.

- Mobile Text: Text STOP to the short code that you do not wish to receive messages from.

NOTE: Message and data rates may apply.

- IM: Click the 'Unsubscribe' link located at the bottom of each instant message. 'Block' link removes your contact information and additionally prevents the same list from adding you again.

- Voice Broadcasts: Follow the voice instruction/prompt when you receive a broadcast call, asking you to press 7 to unsubscribe from voice broadcast messages. You may also call 1-800-764-3090 to unsubscribe from prerecorded calls.

If you believe that your contact information was collected by a BGBC user without your consent and would like to report spam, please email support@chairmansacademy.com. When reporting the offending organization, please include the contact address or number that sent you the spam, the username of the sender, and the message or first few sentences of the message that you consider spam. BGBC has a no tolerance spam policy.

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Your Privacy

BGBC DOES NOT and IS PROHIBITED to share your name or any contact information



PRIVACY POLICY

(including names, email, instant message screen name, and telephone number) with others except for the very owners of the Online Sign-up pages or the mobile keywords through which you volunteered your information. You have given them ("BGBC users") explicit permission to send messages to your contact information when you signed up. If the BGBC user added or imported your information without your permission, you can block the user from adding or importing it again. BGBC believes in a spam-free communication environment.

BGBC may use or disclose information about you, including your personal information, under the following circumstances:

- To provide you with products and services you request.
- To anticipate and resolve problems and conflicts with our products and services.
- For verification and authentication purposes in regards to requests or changes of any personal information or data related.
- For other purposes communicated to you at the time you provide or authorize the use of your information.
- To enforce our Terms of Use and Privacy Policy or other legal agreements.
- To outsource any of the tasks referenced in this Terms of Use and Privacy Policy, such as customer service.
- In response to a subpoena, court order, or other legal process.
- To establish or exercise our legal rights or defend against legal claims.
- To share with a company controlled by, or under common control with BGBC for any purpose permitted by our Terms of Use and Privacy Policy.
- When BGBC believes such use or disclosure is (a) necessary in order to investigate, prevent, or take action regarding suspected illegal activities, fraud, or situations involving potential threats to the physical safety of any person, or (b) required by law.
- In the event of a merger, acquisition, consolidation, divestiture, or bankruptcy of BGBC.

When a BGBC user sends you messages, the message may include a web beacon to determine the number of people who open them. When you click on a link, BGBC or its user may record this individual response to customize special offerings to you. Web beacons collect only limited information, such as a cookie identifier, time and date of a page being viewed, and a description of the page on which the web beacon resides (the URL). Web beacons can be refused. If you do not wish to receive web beacons via email, you will need to disable HTML images or refuse HTML (select Text only) emails via your email software.

Our postal address is:



PRIVACY POLICY

BGBC Management, LLC, 9595 Six Pines, Suite 8210, The Woodlands, Texas 77381.
Our contact information is support@chairmansacademy.com

Last Updated September 13, 2016

BGBC reserves the right, in its sole discretion, to modify or change this Privacy Policy at any time with or without prior notice to you. You must review the current Privacy Policy on a regular basis. Your continued use of the BGBC service following any changes to the Privacy Policy constitutes your full acceptance of those changes. If you have any questions, concerns, or comments about this Privacy Policy, please email us at support@chairmansacademy.com.

Information Collection / Opt-Out

BGBC provides you (the BGBC customer) the tools and resources to collect your subscribers' contact information on an opt-in basis. Subscribers, on the other hand, have the ability to opt out of your distribution lists easily and at any time. Subscribers can grant or revoke your ability to view and export their contact information by logging into the Subscription Management and unchecking the box labeled: "Allow access to my contact information." Online Sign-up.

BGBC allows you to collect email addresses, instant message screen names, phone numbers, and other custom data when subscribers opt in to join your distribution list(s) via an online sign-up page powered by BGBC. When joining a distribution list, we will ask subscribers for personal information such as their name, phone number, IM screen name, and email address. The information they provide and the information BGBC obtains about them may be used to:

- Provide subscribers with products and services they request.
- To anticipate and resolve problems and conflicts with our products and services.
- For verification and authentication purposes in regards to requests or changes of any personal information or data related.
- For other purposes communicated to them at the time they provide or authorize the use of their information.

All subscribers have the ability to unsubscribe or change their personal subscription settings at any time. You should allow and inform your subscribers to unsubscribe by:

- Email: Click the 'Unsubscribe' link located at the bottom of each email.
- Mobile Text: Text STOP to the short code that they do not wish to receive messages from.
- IM: Click the 'Unsubscribe' link located at the bottom of each instant message.
- Voice Broadcasts: Follow the prompt, asking them to press 7 to unsubscribe from voice broadcast messages.



PRIVACY POLICY

You agree to import, add, edit, access or otherwise use only lists for which all listed parties have opted in to receive correspondence from you ("Permission-Based Lists") in connection with your use of the service. You hereby covenant that you shall not use any other lists in connection with your use of the service. In the event that you import or add a subscriber with phone numbers, you must be able to provide tangible proof upon request that the subscriber being imported or added has given prior express written consent to be added to your lists and to receive solicitation messages from you. Written consent may be granted when a subscriber is clearly and fully notified of the collection of their contact information and agrees in writing that he or she may be contacted through their collected contact information. Prior express written consent can be obtained in hand written form or via email, website form, text message, or other methods in compliance with the E-SIGN Act. You will have to obtain prior express written consent from the recipient of your solicitation messages, even if you previously had a business relationship with the recipient. In addition, TCPA has revised a rule regarding text or voice solicitation messages.

You should not assume a preexisting relationship to be a substitute for explicit permission to import corresponding contact information into BGBC system. Nor should you send messages without explicit permission. For example, if your customer disclosed a mobile number in a normal course of business but did not specifically express permission to receive your message, you cannot send messages to the number. If it is discovered that you have been delivering any type of message to recipients who have not granted you permission, you will be held fully accountable for your actions and are subject to any and all legal actions that result from such violations including class action suits whether you use our standard user interface or API.

Mobile Keyword

In addition to Online Sign-up pages, you can also collect mobile phone numbers when subscribers text your mobile keyword (that you create) to BGBC's shared short code. By texting your mobile keyword, subscribers are opting in their mobiles phone numbers to join your distribution list(s). Also, when subscribers text in your mobile keyword, they are giving prior express written consent so you can view and access their mobile numbers. This allows you to send solicitation messages to the subscribers. Subscribers can remove their mobile phone numbers from your database at any time by replying to any text message they receive from BGBC with "STOP". They can also change permission for you to view (or export) their contact information by unchecking "Allow access to my contact information." box while they are signed into the Subscription Management page.

Sharing and Usage / Exporting

BGBC does not share, sell, or rent any contact information with any party. You are not allowed to share your subscribers' contact info with any third party for any reason. However, BGBC may



PRIVACY POLICY

use or disclose information, including your personal information and your subscribers' contact information, under the following very limited circumstances:

- To provide you with products and services requested by you or your subscribers.
- To anticipate and resolve problems and conflicts with our products and services.
- For verification and authentication purposes in regards to requests or changes of any personal information or data related.
- For other purposes communicated to you at the time you provide or authorize the use of your information.
- To enforce our or your Terms of Use and Privacy Policy or other legal agreements.
- To outsource any of the tasks referenced in our Terms of Use and Privacy Policy, such as customer service.
- In response to a subpoena, court order, or other legal process.
- To establish or exercise our legal rights or defend against legal claims.
- To share with a company controlled by, or under common control with BGBC for any purpose permitted by our Terms of Use or Privacy Policy.
- When BGBC believes such use or disclosure is (a) necessary in order to investigate, prevent, or take action regarding suspected illegal activities, fraud, or situations involving potential threats to the physical safety of any person, or (b) required by law.
- In the event of a merger, acquisition, consolidation, divestiture, or bankruptcy of BGBC.

NOTE: The BGBC service is not intended for children under 13, and BGBC does not knowingly collect information from children under the age of 13.

BGBC's Anti-SPAM Policy Last Updated September 13, 2016

BGBC has a NO TOLERANCE anti-SPAM policy. Any account found to be using BGBC for spam will be suspended without notice. If you know of or suspect any violators, please notify us immediately at support@chairmansacademy.com. Any unused credits or remaining service fees will not be refunded.

- BGBC is a strong supporter of a spam-free communication environment.

How Does BGBC Protect You from SPAM?

BGBC is a permission-based email, instant message, voice broadcast, and mobile communication tool that follows strict philosophies:



PRIVACY POLICY

- Communication - Your BGBC online sign-up page must state why you are collecting the person's contact information, how you plan to use the contact information, and must follow BGBC's Terms of Use and Privacy Policy.
- Unsubscribe - Every email and instant message sent from BGBC contains an unsubscribe link which allows contacts to opt out of future emails and instant messages and automatically updates your contact lists by removing the user. The same result is obtained if a user replies to any mobile text with the "STOP" command. Recipients of voice broadcasts can opt out of voice calling by pressing "7" to unsubscribe as well.

Take the Spam Test

If you answer YES to ANY of the questions below, you will likely be labeled a spammer. For more information, contact BGBC Customer Support.

- Are you sending to non-specific email addresses such as: sales@domain.com, business@domain.com, webmaster@domain.com, info@domain.com, or other general email addresses?
- Are you sending to email distribution lists which send indirectly to a variety of email addresses?
- Are you sending emails, instant messages, or mobile texts to anyone who has not opted in or explicitly agreed to join your distribution list?
- Are you sending solicitation message to any phone number without prior express written consent?
- Do your emails, instant messages, voice broadcasts, or mobile texts contain false or misleading information?

Privacy and Anti-SPAM Policies

BGBC has a no tolerance anti-SPAM policy. Any BGBC user found to be sending spam will be immediately cut off from use of the service and may be subject to legal action by BGBC, government authorities, or the recipients of your messages. Evading BGBC's monitoring system or the delivery of spam messages through the system is a clear and serious spam violation. If you know of or suspect any violators, please notify us immediately by emailing support@chairmansacademy.com. Every out-going email and instant message via the BGBC service contains a mandatory unsubscribe link that allows the recipients to remove themselves from your mailing distribution list(s). Voice broadcasts must also include verbal instructions on how to be removed from your calling list. In the case of mobile messages, the initial message must include STOP instructions to opt out of text messages. To unsubscribe, recipients are prompted to text STOP to the short code that sent the unwanted message. If the unsubscribe link is removed or de-activated in any way, or if the text STOP verbiage is omitted, BGBC will terminate the customer's account.



PRIVACY POLICY

What is Spam?

Spam is any type of unsolicited messages. By sending messages to only those who have explicitly requested to receive it, you are following accepted permission-based messaging guidelines. You should not assume a preexisting relationship to be a substitute for explicit consent to send messages. For example, if your customer disclosed a mobile number in a normal course of business but did not specifically express consent to receive your message, you cannot send messages to the number. If it is discovered that you have been delivering any type of message to recipients who have not granted you consent, you will be held fully accountable for your actions. You are subject to any legal actions that result from such violations including class action suits whether you use our standard user interface or API. Please refer to the following list of resources to help combat possible spam violations:

- TCPA
- CAN-SPAM Act
- MMA
- CTIA

What constitutes consent?

The recipient of your message has been clearly and fully notified of the collection and use of his or her contact information and has consented, as required by law, prior to receiving your calls or messages. Consent can be obtained in handwritten form or via email, website form, text message, or other methods in compliance with the E-SIGN Act. You will have to obtain consent from the recipient of your messages, even if you previously had a business relationship with the recipient. You DO NOT have consent if any person purchased a product or service from you or partakes in an event, meeting, conference or general gathering. Nor do you have consent if a person "Likes" or "Follows" your business on Facebook or Twitter. If you require people to confirm that they opt in to your system but have not received a response from those people, then you DO NOT have sufficient consent and may not send messages to those individuals. Subscribers must also be aware that consent is not a condition of purchase.

- What constitutes prior express written consent? If you are sending text or voice messages for solicitation purposes, then your campaign must meet the "prior express written consent" standard. The revised TCPA rule defines "prior express written consent" as a signed written agreement that clearly and conspicuously discloses to the consumer that:
 - By signing the agreement, he or she authorizes the seller to deliver telemarketing messages to a designated phone number using an automatic telephone dialing system and
 - The consumer is not required to sign the agreement or agree to enter into it as a condition of purchasing any property, goods, or services. The required signature may be obtained in



PRIVACY POLICY

compliance with the E-SIGN Act, including via an e-mail, website form, text message, telephone key press, or voice recording. For more details for the revised TCPA rule,

- At BGBC's discretion, any account will be suspended without a refund if the account knowingly or unknowingly contributes to spam or violates federal, state, local or carrier laws or rules. In addition, in BGBC's defense, BGBC may be required to assist the parties claiming damages from your actions related to spam.
- You agree to not access or use ANY third party mailing lists for email addresses, instant message screen names, or phone numbers, or otherwise prepare or distribute unsolicited messages in connection with our service.
- You agree to import, add, edit, access or use only lists for which all listed parties have opted in to receive correspondence from you ("Permission-Based Lists"). You hereby covenant that you shall not use any other lists in connection with your use of the service. In addition, it is prohibited to import phone numbers without tangible proof of the subscribers' explicit consent to receive messages. Doing so will deny you of this feature or be subjected to a stringent qualification process to comply with various local and federal laws. The process includes the proof of method for opt-in, to provide evidence of opt-in, your legal identity and your organization's identity.
- You acknowledge and agree that not all messages sent via BGBC's service will be received by their intended recipients. For example, sending a message to a distribution list may deliver messages to unintended recipients due to the list changing. It is your responsibility to keep your distribution lists updated.
- You agree to comply with all local, state and federal regulations and general practices governing your specific content or promotion type. Additionally, content affiliated with pornographic or sexually explicit material or alcoholic beverages is prohibited. In particular, alcoholic beverages or entertainment content or promotions targeted to people under 21 years of age may not be sent through the system.
- You will adopt and maintain the Privacy Policy, which may be modified by BGBC at any time for any reason.
- You agree to identify your organization, product and service accurately and not deceive your recipients in any message with reference to your identity, offering, availability, pricing, benefits, and any other aspects of your communication.